

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Chicago Title Insurance Company,
individually and as subrogee of AmTrust Bank,
Wells Fargo Bank, N.A., Bank of America,
N.A. and Minnesota Lending Company;

Plaintiff,

vs.

Sportsmens Contracting, Inc.; Lincoln Homes,
Inc.; Pentagon Real Estate Group, Inc.;
Premier Real Estate Services, LLC; Cushman
Realty, Inc.; Wells Title, LLC; Trend Title,
LLC; Thinh Tran a/k/a Tim Tran; Vince Long
Nguyen; Truong Quang Tran a/k/a Trung
Calvin Tran; Katie Thi Tran; Lua Nguyen;
Vera Solodovnikova; Lien Phuong Thi Tran,
Susanne E. Mathis; and David L. Germain, Jr.;
Derrick A. Johnson; Daniel S. Rollings;
Guarantee Trust & Title Corporation; Rachael
Brabant; Perfection Lending, Inc.; Invescorp,
Inc.; Todd Cushman;

Defendants.

Case No. 11-cv-03314 – SRN/AJB

**STIPULATION FOR
WITHDRAWAL OF ANSWER AND
CROSSCLAIM OF PENTAGON REAL
ESTATE GROUP, INC.**

Pursuant to Fed. R. Civ. P. Rule 41(a)(1)(ii), it is hereby stipulated and agreed by and between Plaintiff Chicago Title Insurance Company, individually and as subrogee of AmTrust Bank, Wells Fargo Bank, N.A., Bank of America, N.A. and Minnesota Lending Company (“Plaintiff”), and Defendant Pentagon Real Estate Group, Inc. (“Pentagon”), that Pentagon’s Answer to the Second Amended Complaint and Crossclaim, as well as its earlier filed Answers and Crossclaims, shall be withdrawn, and CTIC shall be permitted to obtain default judgment against Pentagon in the amount of \$2,529,734.67 or whatever amount the Court deems appropriate pursuant to the pending motion for default judgment which is to be heard on May 14, 2013.

This Stipulation does not affect Plaintiff's claims against any of the remaining Defendants in this action.

Dated: May 7, 2013.

STEVEN J. LODGE, PLLC

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Dated: May 7, 2013.

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